

From: [Adam Slater](#)
To: [Geoppinger, Jeff](#)
Cc: DECValsartan@btlaw.com; valpec@kirtlandpackard.com
Subject: [EXTERNAL]Re: Downstream Defendants Identification of Settlement Counsel
Date: Friday, January 28, 2022 4:08:22 PM

Jeff and all defense counsel:

We have previously requested disclosure and production of all indemnification agreements, oral or written, between and among the defendants, and have obtained at least some of those in discovery. In order to ensure that we have all such agreements and a comprehensive understanding of the landscape, we request disclosure and production thereof - confirming that what is disclosed is complete.

In addition, please disclose any public or private litigation, arbitration, claims, or other proceedings between and among any defendants with regard to the subject of indemnification or who will pay any settlement or judgment.

I am sure you understand our need to fully understand this aspect of the litigation as we presumably begin settlement discussions, and we hope that you will agree to produce this information within ten days. If not, we will need to add this issue to the agenda and will raise the issue with Judge Kugler next week, inasmuch as this relates to potential settlement activity and Judge Kugler's interest in that subject.

Please let us know your position, which we hope will be agreement to cooperate and provide the requested information.

Thank you,

Adam Slater

> On Jan 28, 2022, at 2:56 PM, Geoppinger, Jeff <jgeoppinger@ulmer.com> wrote:
>
> <2022-01-28 Downstream Defendants Letter to Judge Kugler.pdf>

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